



**AIR QUALITY BUREAU  
NEW SOURCE REVIEW PERMIT  
Issued under 20.2.72 NMAC**

Certified Mail No:  
Return Receipt Requested

**DRAFT as of January 21, 2022**

**NSR Permit No:** 6567-M8  
**Facility Name:** Black River Gas Processing Plant  
**Facility Owner/Operator:** DLK Black River Midstream, LLC  
**Mailing Address:** 5400 LBJ Freeway  
Suite 1500  
Dallas, TX 75240

**TEMPO/IDEA ID No:** 36133 - PRN20200001  
**AIRS No:** 350151435

**Permitting Action:** Regular - New  
**Source Classification:** TV Major

**Facility Location:** UTM E 581750 m, UTM N 3570090 m, Zone 13,  
Datum: NAD83

**County:** Eddy

**Air Quality Bureau Contact** Julia Kuhn  
**Main AQB Phone No.** (505) 476-4300

\_\_\_\_\_  
**Liz Bisbey-Kuehn**  
**Bureau Chief**  
**Air Quality Bureau**

\_\_\_\_\_  
**Date**

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**PART A FACILITY SPECIFIC REQUIREMENTS****A100 Introduction**

- A. This permit, NSR 6567-M8, supersedes all portions of Air Quality NSR Permit GCP 6567-M7, issued August 28, 2020, except portions requiring compliance tests. Compliance test conditions from previous permits, if not completed, are still in effect, in addition to compliance test requirements contained in this permit.

**A101 Permit Duration (expiration)**

- A. The term of this permit is permanent unless withdrawn or cancelled by the Department.

**A102 Facility: Description**

- A. The function of the facility is to compress, dehydrate, remove CO<sub>2</sub> and natural gas liquids from sweet field gas for transportation to a sales pipeline.
- B. This facility is located approximately 2.1 miles Southwest of Loving, New Mexico in Eddy County.
- C. The facility is currently operating under the GCP O&G permit 6567-M7. A new NSR permit is required to accommodate increased emissions resulting from changes in engine operation from 2190 hours/year to 8760 hours/year and from revising emission calculations based on manufacturer's data, addition of equipment (HT-803) and SSM/M.
- D. Tables 102.A and Table 102.B show the total potential emission rates (PER) from this facility for information only. This is not an enforceable condition and excludes emissions from Minor NSR exempt activities per 20.2.72.202 NMAC.

**Table 102.A: Total Potential Emission Rate (PER) from Entire Facility**

<b>Pollutant</b>	<b>Emissions (tons per year)</b>
Nitrogen Dioxide	151.0
Carbon Monoxide	184.4
Volatile Organic Compounds (VOC) <sup>1</sup>	227.9
Sulfur Dioxide	100.2
Particulate Matter (PM) <sup>2</sup>	9.9
Particulate Matter (10 microns or less)	9.9
Particulate Matter (2.5 microns or less)	8.1
Hydrogen Sulfide (H <sub>2</sub> S)	1.89

**Table 102.A: Total Potential Emission Rate (PER) from Entire Facility**

<b>Pollutant</b>	<b>Emissions (tons per year)</b>
Greenhouse Gas (GHG) as CO <sub>2</sub> e	113,121.97

1. VOC total includes emissions from Fugitives, SSM and Malfunctions.
2. PM is a regulated new source review pollutant per 20.2.74 NMAC Prevention of Significant Deterioration and 20.2.70 NMAC, Title V. No ambient air quality standards apply to TSP or PM.

**Table 102.B: Total Potential Emissions Rate (PER) for \*Hazardous Air Pollutants (HAPs) that exceed 1.0 ton per year**

<b>Pollutant</b>	<b>Emissions (tons per year)</b>
Acetaldehyde	2.3
Acrolein	1.4
Benzene	9.6
Formaldehyde	2.2
Total HAPs **	15.8

- \* HAP emissions are already included in the VOC emission total.
- \*\* The total HAP emissions may not agree with the sum of individual HAPs because only individual HAPs greater than 1.0 tons per year are listed here.

**A103 Facility: Applicable Regulations**

- A. The permittee shall comply with all applicable sections of the requirements listed in Table 103.A.

**Table 103.A: Applicable Requirements**

<b>Applicable Requirements</b>	<b>Federally Enforceable</b>	<b>Unit No.</b>
20.2.1 NMAC General Provisions	X	Entire Facility
20.2.3 NMAC Ambient Air Quality Standards	X	Entire Facility
20.2.7 NMAC Excess Emissions	X	Entire Facility
20.2.61 NMAC Smoke and Visible Emissions	X	Units ENG-1, ENG-2, ENG-3, ENG-4, HT-101, HT-102, HT-103, HT-801, HT-802, HT-803, DR-1, DR-2, AR-1, AR-2, VCU-1, FL-1, FL-2, FL-3, TO-1, and TO-2,
20.2.70 NMAC Operating Permits	X	Entire Facility
20.2.71 NMAC Operating Permit Emission Fees	X	Entire Facility
20.2.72 NMAC Construction Permit	X	Entire Facility

**Table 103.A: Applicable Requirements**

<b>Applicable Requirements</b>	<b>Federally Enforceable</b>	<b>Unit No.</b>
20.2.73 NMAC Notice of Intent and Emissions Inventory Requirements	X	Entire Facility
20.2.75 NMAC Construction Permit Fees	X	Entire Facility
20.2.77 NMAC New Source Performance Standards	X	Units subject to 40 CFR 60
20.2.82 NMAC Maximum Achievable Control Technology Standards for Source Categories of HAPs	X	Units subject to 40 CFR 63
40 CFR 50 National Ambient Air Quality Standards	X	Entire Facility
40 CFR 60, Subpart A, General Provisions	X	ENG-1, ENG-2, ENG-3, ENG-4, FUG, AM-1, AM-2, CRYO-1, CRYO-2, CRYO-3
40 CFR 60, Subpart JJJJ	X	ENG-1, ENG-2, ENG-3, ENG-4
40 CFR 60, Subpart OOOOa	X	FUG, AM-1, AM-2, CRYO-1, CRYO-2, CRYO-3, Compressors for ENG-1 through ENG-4, TK-702A-F, TK-701
40 CFR 63, Subpart A, General Provisions	X	ENG-1, ENG-2, ENG-3, ENG-4, DEHY-1, DEHY-2
40 CFR 63, Subpart HH	X	DEHY-1, DEHY-2
40 CFR 63, Subpart ZZZZ	X	ENG-1, ENG-2, ENG-3, ENG-4

**A104 Facility: Regulated Sources**

- A. Table 104.A lists the emission units authorized for this facility. Emission units identified as exempt activities (as defined in 20.2.72.202 NMAC) and/or equipment not regulated pursuant to the Act are not included.

**Table 104.A: Regulated Sources List**

Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site
ENG-1	Internal combustion engine	Waukesha	P9394GSI	5283705346	2018	01-JAN-17	2250 hp / 2250 hp	2250 hp / 2250 hp
ENG-2	Internal combustion engine	Waukesha	P9394GSI	5283705365	2018	01-JAN-17	2250 hp / 2250 hp	2250 hp / 2250 hp
ENG-3	Internal combustion engine	Waukesha	P9394GSI	5283705405	2018	01-JAN-17	2250 hp / 2250 hp	2250 hp / 2250 hp
ENG-4	Internal combustion engine	Waukesha	P9394GSI	5283705381	2018	01-JAN-17	2250 hp / 2250 hp	2250 hp / 2250 hp
HT-101	Process Heater	Heat Recovery Corp	4HE-14-4HE-4-6-E	TBDRS15642	2016	01-JAN-16	6.97 MM BTU/h / 6.97 MM BTU/h	6.97 MM BTU/h / 6.97 MM BTU/h
HT-102	Process Heater	Heat Recovery Corp	6HE-10-4H-6-4HE-4-6-E	RS 19735	01-JAN-20	01-JAN-19	9.74 MM BTU/h / 9.74 MM BTU/h	9.74 MM BTU/h / 9.74 MM BTU/h
HT-103	Process Heater	Heat Recovery Corp	6HE-10-4H-6-4HE-4-6-E	RS 19735	01-JAN-20	01-JAN-19	9.74 MM BTU/h / 9.74 MM BTU/h	9.74 MM BTU/h / 9.74 MM BTU/h
HT-801	Process Heater	Heat Recovery Corp	4HE-14-4HE-4-6-E	RS15641	01-JAN-16	01-JAN-16	6.97 MM BTU/h / 6.97 MM BTU/h	6.97 MM BTU/h / 6.97 MM BTU/h
HT-802	Process Heater	Heat Recovery Corp	4HE-14-4HE-4-6-E	RS 19732	01-JAN-20	01-JAN-19	6.2 MM BTU/h / 6.2 MM BTU/h	6.2 MM BTU/h / 6.2 MM BTU/h
HT-803	Process Heater	Heat Recovery Corp	TBD	TBD	Not Reported	TBD	6.2 MM BTU/h / 6.2 MM BTU/h	6.2 MM BTU/h / 6.2 MM BTU/h
AM-1	Amine sweetening unit	Veritas Gas Processing, LP	Custom	7362	11/15/2018	01-JAN-18	290 MM SCFD / 290 MM SCFD	290 MM SCFD / 290 MM SCFD

Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site
AM-2	Amine sweetening unit	Veritas Gas Processing, LP	Custom	J-423	Not Reported	01-JAN-19	220 MM SCFD / 220 MM SCFD	220 MM SCFD / 220 MM SCFD
DR-1	Glycol Dehy Reboiler Burner	Flamesco	SB38-24B	1709-064	1/20/2018	01-JAN-17	2.9 MM BTU/h / 2.9 MM BTU/h	2.9 MM BTU/h / 2.9 MM BTU/h
DR-2	Glycol Dehy Reboiler Burner	Tryer	Custom	17-020-305	Not Reported	01-JAN-19	2.5 MM BTU/h / 2.5 MM BTU/h	2.5 MM BTU/h / 2.5 MM BTU/h
AR-1	Amine Reboiler	Tulsa Heaters	SHO1500	MJ18-325	11/1/2018	01-JAN-18	21.09 MM BTU/h / 21.09 MM BTU/h	21.09 MM BTU/h / 21.09 MM BTU/h
AR-2	Amine Reboiler	Tulsa Heaters	SH 01750	MJ19-409	2/1/2020	01-JAN-19	23.92 MM BTU/h / 23.92 MM BTU/h	23.92 MM BTU/h / 23.92 MM BTU/h
DEHY-1	Glycol Dehy	Tryer	Custom	17-020-300	1/20/2018	01-JAN-17	290 MM SCF/d / 290 MM SCF/d	290 MM SCF/d / 290 MM SCF/d
DEHY-2	Glycol Dehy	Tryer	Custom	17-020-300	Not Reported	01-JAN-19	220 MM SCF/d / 220 MM SCF/d	220 MM SCF/d / 220 MM SCF/d
TO-1	Thermal Oxidizer (Incinerator)	Zeeco	EGF-7-40	35563-001	01-JAN-18	01-JAN-18	9.9 MM BTU/h / 9.9 MM BTU/h	9.9 MM BTU/h / 9.9 MM BTU/h
TO-2	Thermal Oxidizer (Incinerator)	Zeeco	Custom	42234	Not Reported	01-JAN-19	9.9 MM SCFD / 9.9 MM SCFD	9.9 MM SCFD / 9.9 MM SCFD
FL-1	Plant 1 Flare SSM/M	Zeeco, Inc.	Custom	28269	3/10/2016	01-JAN-16	1,745 MM BTU/h / 1,745 MM BTU/h	1,745 MM BTU/h / 1,745 MM BTU/h



Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site
FL-2	Process (DEHY-1)/ Plant 2 SSM/M Flaring	Zeeco, Inc.	Custom	32609	1/20/2018	01-JAN-16	3,280 MM BTU/h / 3,280 MM BTU/h	3,280 MM BTU/h / 3,280 MM BTU/h
FL-3	Plant 3 Flare SSM/M	Zeeco, Inc.	Custom	42050	01-JAN-2020	2020	3,280 MM BTU/h / 3,280 MM BTU/h	3,280 MM BTU/h / 3,280 MM BTU/h
TK-702A	Condensate Tank - Above Ground	Global Vessel Tank	12F	LVK11999	6/11/2016	01-JAN-16	500 bbl / 500 bbl	500 bbl / 15330000 gal/y
TK-702B	Condensate Tank - Above Ground	Global Vessel Tank	12F	LVK11998	6/11/2016	01-JAN-16	500 bbl / 500 bbl	500 bbl / 15330000 gal/y
TK-702C	Condensate Tank - Above Ground	Global Vessel Tank	12F	LVK11995	6/11/2016	01-JAN-16	500 bbl / 500 bbl	500 bbl / 15330000 gal/y
TK-702D	Condensate Tank - Above Ground	Global Vessel Tank	12F	LVK11997	6/11/2016	01-JAN-16	500 bbl / 500 bbl	500 bbl / 15330000 gal/y
TK-702E	Condensate Tank - Above Ground	Global Vessel Tank	12F	LVK11996	6/11/2016	01-JAN-16	500 bbl / 500 bbl	500 bbl / 15330000 gal/y
TK-702F	Condensate Tank - Above Ground	Global Vessel Tank	12F	LVK12000	6/11/2016	01-JAN-16	500 bbl / 500 bbl	500 bbl / 15330000 gal/y
TK-701	Produced Water Tank - Above Ground	Global Vessel Tank	12F	LVK11994	6/11/2016	01-JAN-16	500 bbl / 500 bbl	500 bbl / 2301523 gal/y

Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site
VCU-1	Vapor Combustion Unit (Incinerator)	Kimark, Inc.	Smart Flare 64	132930	6/11/2016	01-JAN-16	7.11 MM BTU/h / 7.11 MM BTU/h	7.11 MM BTU/h / 7.11 MM BTU/h
TL-1	Condensate Tanks Truck Loading	NA	NA	NA	Not Reported	01-JAN-16	42000 bbl/y	42000 bbl/y
TL-2	Produced Water Tanks Truck Loading	NA	NA	NA	Not Reported	01-JAN-16	1050 bbl/y	1050 bbl/y
FUG	Fugitives	NA	NA	NA	Not Reported	NA	NA	NA
Cryo-1	Cryogenic Unit	EPC, Inc.	NA	J-387	3/15/2016	01-JAN-16	70 MM SCFD / 70 MM SCFD	70 MM SCFD / 70 MM SCFD
Cryo-2	Cryogenic Unit	Veritas Gas Processing, LP	NA	J-412	10/20/2017	01-JAN-17	220 MM SCFD / 220 MM SCFD	220 MM SCFD / 220 MM SCFD
Cryo-3	Cryogenic Unit	Veritas Gas Processing, LP	NA	J-423	Not Reported	01-JAN-19	220 MM SCFD / 220 MM SCFD	220 MM SCFD / 220 MM SCFD
MAL (FL-1, FL-2, FL-3)	Malfunction Flaring	NA	NA	NA	Not Reported	NA	NA	NA
TO-1 SSM	Thermal Oxidizer (Amine AM-1) Venting	NA	NA	NA	Not Reported	NA	NA	NA
TO-2 SSM	Thermal Oxidizer (Amine AM-2 and DEHY-2) Venting	NA	NA	NA	NA	NA	NA	NA
Malfunction Venting	Malfunction Venting	NA	NA	NA	NA	NA	NA	NA
SSM	SSM Venting	NA	NA	NA	NA	NA	NA	NA

Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site
VCU-1 SSM	Vapor Combustion Unit Downtime	NA	NA	NA	NA	NA	NA	NA

1. All TBD (to be determined) units and like-kind engine replacements must be evaluated for applicability to NSPS and MACT requirements.

### **A105 Facility: Control Equipment**

- A. Table 105 lists all the pollution control equipment required for this facility. Each emission point is identified by the same number that was assigned to it in the permit application.

**Table 105.A: Control Equipment List:**

Control Equipment Unit No.	Control Description	Pollutant being controlled	Control for Unit Number(s) <sup>1</sup>
ENG-1	Catalytic Converter Air Fuel Ratio Controller	NO <sub>x</sub> , CO, VOC, HCOH	ENG-1
ENG-2	Catalytic Converter Air Fuel Ratio Controller	NO <sub>x</sub> , CO, VOC, HCOH	ENG-2
ENG-3	Catalytic Converter Air Fuel Ratio Controller	NO <sub>x</sub> , CO, VOC, HCOH	ENG-3
ENG-4	Catalytic Converter Air Fuel Ratio Controller	NO <sub>x</sub> , CO, VOC, HCOH	ENG-4
TO-1	Thermal Oxidizer (Incinerator)	VOC, HAP	AM-1 (waste gas stream)
TO-2	Thermal Oxidizer (Incinerator)	VOC, HAP	AM-2 (waste gas stream) & DEHY-2 (regenerator)
FL-1	Flare	VOC, H <sub>2</sub> S, HAP	SSM/M
FL-2	Flare	VOC, H <sub>2</sub> S, HAP	DEHY-1 (regenerator) DEHY-1 (SSM flash), AM-1 (SSM flash), Compressor Blowdowns, SSM/M
FL-3	Flare	VOC, H <sub>2</sub> S, HAP	DEHY-2 (SSM flash), AM-2 (SSM)



Unit No.	NO <sub>x</sub> (pph)	<sup>1</sup> NO <sub>x</sub> (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO <sub>2</sub> (pph)	SO <sub>2</sub> (tpy)	PM <sub>10</sub> / PM <sub>2.5</sub> (pph)	PM <sub>10</sub> / PM <sub>2.5</sub> (tpy)	H <sub>2</sub> S (pph)	H <sub>2</sub> S (tpy)
DR-2	<	1.0	<	<	<	<	<	<	<	<	-	-
AR-1	2.0	8.5	1.6	7.2	<	<	<	<	<	<	-	-
AR-2	2.2	9.7	1.9	8.1	<	<	<	<	<	<	-	-
DEHY-1	-	-	-	-	0.0	0.0	-	-	-	-	-	-
DEHY-2	-	-	-	-	0.0	0.0	-	-	-	-	-	-
TO-1	1.4	6.3	1.3	5.8	0.4	1.6	12.3	53.8	0.5/ 0.4	2.2/ 1.6	0.1	0.6
TO-2	2.2	9.7	2.0	9.0	3.8	16.6	9.4	41.0	0.4/ 0.3	1.8/ 1.4	0.1	0.4
FL-1	0.04	0.16	0.03	0.13	2.0E- 03	0.01	2.2E- 04	9.5E- 04	-	-	1.1E- 04	5.0E- 04
FL-2	1.70	7.44	3.33	14.60	3.49	15.29	0.10	0.43	-	-	1.2E- 03	0.01
FL-3	0.05	0.20	0.04	0.17	2.5E- 03	0.01	2.8E- 04	1.2E- 03	-	-	1.5E- 04	6.4E- 04
TK-702A	-	-	-	-	0.0	0.0	-	-	-	-	-	-
TK-702B	-	-	-	-	0.0	0.0	-	-	-	-	-	-
TK-702C	-	-	-	-	0.0	0.0	-	-	-	-	-	-
TK-702D	-	-	-	-	0.0	0.0	-	-	-	-	-	-
TK-702E	-	-	-	-	0.0	0.0	-	-	-	-	-	-
TK-702F	-	-	-	-	0.0	0.0	-	-	-	-	-	-
TK-701	-	-	-	-	0.0	0.0	-	-	-	-	-	-
VCU-1	1.2	5.4	2.5	10.8	8.1	35.5	5.7E- 04	2.5E- 03	<	<	9.8E- 06	4.3E- 05
TL-1	-	-	-	-	*	4.1	-	-	-	-	<	<
TL-2	-	-	-	-	*	0.2	-	-	-	-	<	<
FUG	-	-	-	-	*	34.5	-	-	-	-	<	<

1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO<sub>2</sub>

2 For Title V facilities, the Title V annual fee assessments are based on the sum of allowable tons per year emission limits in Sections A106 and A107.

“-” indicates the application represented emissions of this pollutant are not expected.

“<” indicates that the application represented the uncontrolled mass emission rates are less than 1.0 pph or 1.0 tpy for this emissions unit and this air pollutant. The Department determined that allowable mass emission limits were not required for this unit and this pollutant.

“\*” indicates hourly emission limits are not appropriate for this operating situation.

3 To report excess emissions for sources with no pound per hour and/or ton per year emission limits, see condition B110F.

**A107 Facility: Allowable Startup, Shutdown, & Maintenance (SSM) and Malfunction Emissions**

- A. The maximum allowable SSM and Malfunction emission limits for this facility are listed in Table 107.A and were relied upon by the Department to determine compliance with applicable regulations.

**Table 107.A: Allowable SSM and Malfunction Units, Activities and Emission Limits**

Unit No.	Description	NO <sub>x</sub> pph	NO <sub>x</sub> tpy	CO pph	CO tpy	VOC pph	VOC tpy	SO <sub>2</sub> pph	SO <sub>2</sub> tpy	H <sub>2</sub> S pph	H <sub>2</sub> S pph
TO-1 SSM	TO-1/TO-2 (thermal oxidizer - 2% downtime)	-	-	-	-	19.5	1.7	-	-	6.5	0.6
TO-2 SSM		-	-	-	-	190.3	16.7	-	-	5.2E-02	4.6E-03
Malfunction	Malfunction Venting	-	-	-	-	*	4.0	-	-	<	<
FL-1	Compressor blowdowns, plant blowdowns DEHY-1/DEHY-2 and AM-1/AM-2 Flash Emissions)	103.6	5.0	206.7	9.9	99.7	4.8	0.6	1.2E-02	6.4E-03	3.1E-04
FL-2		173.8	9.6	347.0	18.8	168.1	9.7	1.0	7.5E-02	1.1E-02	1.5E-03
FL-3		143.8	7.9	287.0	15.9	139.3	8.3	10.1	0.9	1.1E-01	9.3E-03
FL-1 Malfunction	Malfunction Flaring <sup>4</sup>	103.6	6.2	206.7	10.0	*	6.0	0.6	3.4E-02	6.4E-03	3.8E-04
FL-2 Malfunction		173.9		347.0		*		1.0		1.1E-02<	
FL-3 Malfunction		143.8		287.0		*		10.1		<	
VCU-1 SSM	Tanks (1% downtime)	-	-	-	-	*	17.8	-	-	3.00E-04	1.3E-05
SSM	Pig Launcher Blowdowns	-	-	-	-	*	12.1	-	-	<	<

1. This authorization does not include VOC combustion emissions.

“<” indicates the application represented that uncontrolled venting, blowdown, or pigging emissions of H2S are less than 0.1 pph or 0.44 tpy. Allowable limits, monitoring, and recordkeeping are not required on this level of H2S venting, blowdown, or pigging emissions.

2. To report excess emissions for sources with no pound per hour and/or ton per year emission limits, see condition B110F.
3. “\*” indicates hourly emission limits are not appropriate for this operating situation.
4. Compressor blowdowns, plant blowdowns DEHY-1 and AM-1/AM-2 Flash Emissions during malfunction

B. The authorization of emission limits for startup, shutdown, maintenance, and malfunction does not supersede the requirements to minimize emissions according to General Conditions B101.F and B107.A.

C. SSM Venting Emissions from Pig Launcher Blowdowns, VCU-1 SSM, TO-1 SSM, and TO-2 SSM

**Requirement:** To demonstrate compliance with each SSM venting activity in Table 107.A, the permittee shall monitor and record the monthly rolling 12-month total hours or events as described below.

The permittee shall perform a facility inlet gas analysis once every year based on a calendar year and complete the following recordkeeping to demonstrate compliance with routine and predictable startup, shutdown, and maintenance (SSM) emission limits in Table 107.A.

**Monitoring:** The permittee shall electronically monitor the number of hours or events due to the following SSM activities:

- (1) Pig Launder Blowdown SSMs vented to atmosphere shall not exceed 365 events per monthly rolling 12-month period
- (2) Unit VCU-1 vapors vented to atmosphere shall not exceed 87.6 hours per monthly rolling 12-month period
- (3) Unit TO-1 vapors vented to atmosphere shall not exceed 175.2 hours per monthly rolling 12-month period
- (4) Unit TO-2 vapors vented to atmosphere shall not exceed 175.2 hours per monthly rolling 12-month period.

**Recordkeeping:** To demonstrate compliance, each month records shall be kept of the cumulative total of VOC and H2S emissions during the first 12 months due to SSM events and, thereafter of the monthly rolling 12-month total VOC emissions.

Records shall also be kept of the inlet gas analysis, the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the VOC and H2S emissions due to SSM events.

**Reporting:** The permittee shall report in accordance with Section B110.

D. SSM and Malfunction Emission Flaring Limits (Units FL-1, FL-2, & FL-3)

**Requirements:** The permittee shall not exceed the pound per hour (pph) and ton per year (tpy) emission limits in Table A107.A and shall demonstrate compliance with these limits by

calculating and summarizing these emission rates as required in recordkeeping.

- (1) Flares FL-1 and FL-3 are authorized to have emissions resulting from the pilot flame as represented in Table 106.A;
- (2) Flares FL-1, FL-2, and FL-3 are authorized for SSM and malfunction emissions as represented in Table 107.A.

The permittee has the option to report pound per hour and/or ton per year emissions in excess of the pilot and/or steady state emission limits in Table 106.A due to a malfunction in an excess emissions report per 20.2.7.110.A(2) NMAC rather than counting those malfunction emissions toward the malfunction (M) emission limits in this permit. However, once emissions from a malfunction event are submitted in a final excess emissions report (due no later than ten days after the end of the event) per 20.2.7.110.A(2) NMAC, the event is considered an excess emission and can no longer be applied toward the malfunction emission limits in this permit.

#### **Emissions Due to Preventable Events**

Emissions that are due entirely or in part to poor maintenance, careless operation, or any other preventable equipment breakdown shall not be included under the pound per hour or tpy SSM or malfunction emission limits. These emissions shall be reported as excess emissions in accordance with 20.2.7.110 NMAC.

**Monitoring:** The permittee shall complete a gas analysis that measures total sulfur content of all gas streams at least once per calendar year and shall continuously measure the totalized flow volume, calculated VOC content and H<sub>2</sub>S content of all gas streams (pilot and process) sent to FL-1, FL-2, and FL-3.

**Recordkeeping:** The permittee shall maintain the following records:

- (1) The hourly totalized flow volume of all gas streams (pilot and process) sent to FL-1, FL-2, and FL-3.
- (2) The calculated hourly net heating value of the combined gas streams sent to Flares FL-1, FL-2, and FL-3.
- (3) The calculated hourly NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, and H<sub>2</sub>S emission rates for each FL-1, FL-2, and FL-3 flaring event. The emission rate calculation shall be based on the calculated waste gas H<sub>2</sub>S composition, heating value, and flowrate; the VOC content, the pilot fuel flow volume, and the calculated hourly heat input rate (MMBtu/hr) for the combined gas streams.
- (4) The emission factors used to calculate the flare emissions.
- (5) The permittee shall also record the monthly rolling 12-month total flowrate and monthly rolling 12-month NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, and H<sub>2</sub>S tons per year emission rates for each flare.
- (6) The emission rate calculation shall be based on the monthly rolling 12-month annual flow volume of waste gas, annual acid gas analysis that measures the total sulfur content, and the average monthly and 12-month rolling annual measured heat input rates (MMBtu/hr) of the waste gas, expressed as a weighted average.



- (7) For each event, the permittee shall record if the emissions are due to a SSM or a malfunction (M) event; which limit (SSM or M) that the emissions apply to; and a description of the equipment, activity, or unit number that is the source of emissions. Any malfunction emissions that were reported in a final excess emissions report per 20.2.7.110.A(2) NMAC, shall be excluded from this total.
- (8) If emissions are due to a malfunction, the permittee shall indicate in a record whether the emissions resulting from the event were counted toward the pound per hour and ton per year emission limits in this permit, or if the emissions were instead reported as excess emissions in a final excess emissions report per 20.2.7.110.A(2) NMAC.
- (9) The permittee shall also meet the recordkeeping requirements in General Condition B109 of this permit, except the requirement to record the start and end times of SSM and M events shall not apply.

**Reporting:** The permittee shall report in accordance with Section B110 and in accordance with 20.2.7 NMAC, if applicable.

#### E. Malfunction Emissions (Venting)

**Requirement:** The permittee shall perform a facility inlet gas analysis once every year based on a calendar year and complete the following recordkeeping to demonstrate compliance with malfunction (M) emission limits in Table 107.A.

**Monitoring:** The permittee shall monitor all malfunction events that result in VOC emissions including identification of the equipment or activity that is the source of emissions.

**Recordkeeping:**

- (1) To demonstrate compliance, each month records shall be kept of the cumulative total of VOC emissions due to malfunction events during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions due to malfunction events.
- (2) Records shall also be kept of the inlet gas analysis, the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the pound per hour limits in Table 106.A (or the pound per hour limits in condition B110F, if applicable), under 20.2.7 NMAC.
- (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.

**Reporting:** The permittee shall report in accordance with Section B110.

**A108 Facility: Allowable Operations**

- A. This facility is authorized for continuous operation. Monitoring, recordkeeping, and reporting are not required to demonstrate compliance with continuous hours of operation.
- B. The Facility Inlet Flowrate Limit

<b>Requirement:</b> The flowrate of process gas entering the facility shall not exceed 510 MMscf/day on a rolling daily average.
<b>Monitoring:</b> The Facility inlet flowrate shall be continuously monitored. The flowrate shall be determined using a monitoring instrument that directly measures natural gas flowrate into the facility with an accuracy of $\pm 2\%$ or better.
<b>Recordkeeping:</b> The Permittee shall record the daily flowrate of process gas (MMscfd) received at the Facility inlet. Records indicating the daily gas flow shall be maintained onsite for a minimum of five (5) years from the time of recording and made available to Department personnel upon request.
<b>Reporting:</b> The permittee shall report in accordance with Section B110.

**A109 Facility: Reporting Schedules**

- A. The permittee shall report according to the Specific Conditions and General Conditions of this permit.

**A110 Facility: Fuel and Fuel Sulfur Requirements**

- A. Fuel and Fuel Sulfur Requirements (Units ENG-1, ENG-2, ENG-3, ENG-4, HT-101, HT-102, HT-103, HT-801, HT-802, HT-803, DR-1, DR-2, AR-1, and AR-2)

<b>Requirement:</b> All combustion emission units shall combust only natural gas containing no more than 5 grains of total sulfur per 100 dry standard cubic feet
<b>Monitoring:</b> No monitoring is required. Compliance is demonstrated through records.
<b>Recordkeeping:</b> <ul style="list-style-type: none"> <li>(1) The permittee shall demonstrate compliance with the natural gas or fuel oil limit on total sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the gaseous or liquid fuel, or fuel gas analysis, specifying the allowable limit or less.</li> <li>(2) If fuel gas analysis is used, the analysis shall not be older than one year.</li> <li>(3) Alternatively, compliance shall be demonstrated by keeping a receipt or invoice from a commercial fuel supplier, with each fuel delivery, which shall include the delivery date, the fuel type delivered, the amount of fuel delivered, and the maximum sulfur content of the fuel.</li> </ul>

**Reporting:** The permittee shall report in accordance with Section B110.

**A111 Facility: 20.2.61 NMAC Opacity**

- A. 20.2.61 NMAC Opacity Limit (Units ENG-1, ENG-2, ENG-3, ENG-4, HT-101, HT-102, HT-103, HT-801, HT-802, HT-803, DR-1, DR-2, VCU-1, AR-1, and AR-2)

**Requirement:** Visible emissions from all stationary combustion emission stacks shall not equal or exceed an opacity of 20 percent in accordance with the requirements at 20.2.61.109 NMAC.

**Monitoring:**

- (1) Use of natural gas fuel constitutes compliance with 20.2.61 NMAC unless opacity equals or exceeds 20% averaged over a 10-minute period. When any visible emissions are observed during operation other than during startup mode, opacity shall be measured over a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method 9 (EPA Method 9) as required by 20.2.61.114 NMAC, or the operator will be allowed to shut down the equipment to perform maintenance/repair to eliminate the visible emissions. Following completion of equipment maintenance/repair, the operator shall conduct visible emission observations following startup in accordance with the following procedures:
- (a) Visible emissions observations shall be conducted over a 10-minute period during operation after completion of startup mode in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method 22 (EPA Method 22). If no visible emissions are observed, no further action is required.
- (b) If any visible emissions are observed during completion of the EPA Method 22 observation, subsequent opacity observations shall be conducted over a 10-minute period, in accordance with the procedures at EPA Method 9 as required by 20.2.61.114 NMAC.

For the purposes of this condition, *Startup mode* is defined as the startup period that is described in the facility's startup plan.

**Recordkeeping:**

- (1) If any visible emissions observations were conducted, the permittee shall keep records in accordance with the requirements of Section B109 and as follows:
- (a) For any visible emissions observations conducted in accordance with EPA Method 22, record the information on the form referenced in EPA Method 22, Section 11.2.
- (b) For any opacity observations conducted in accordance with the requirements of EPA Method 9, record the information on the form referenced in EPA Method 9, Sections 2.2 and 2.4.

**Reporting:** The permittee shall report in accordance with Section B110.

**OIL AND GAS INDUSTRY**

**A200 Oil and Gas Industry**

A. This section has common equipment related to most Oil and Gas Operations.

**A201 Engines**

A. Periodic Emissions Testing (Units ENG-1, ENG-2, ENG-3, and ENG-4)

**Requirement:** Compliance with the allowable emission limits in Table 106.A shall be demonstrated by completing periodic emission tests during the monitoring period.

**Monitoring:** The permittee shall test using a portable analyzer or EPA Reference Methods subject to the requirements and limitations of Section B108, General Monitoring Requirements. Emission testing is required for NOx and CO and shall be carried out as described below.

Test results that demonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits.

For units with g/hp-hr emission limits, in addition to the requirements stated in Section B108, the engine load shall be calculated by using the following equation:

$$\text{Load(Hp)} = \frac{\text{Fuel consumption (scfh)} \times \text{Measured fuel heating value (LHV btu/scf)}}{\text{Manufacturer's rated BSFC (btu/bhp-hr) at 100\% load or best efficiency}}$$

- (1) The testing shall be conducted as follows:
  - (a) Testing frequency shall be once per quarter.
  - (b) The monitoring period is defined as a calendar quarter.
- (2) The first test shall occur within the first monitoring period occurring after permit issuance.
- (3) All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period.
- (4) The permittee shall follow the General Testing Procedures of Section B111.
- (5) Performance testing required by 40 CFR 60, Subpart JJJJ or 40 CFR 63, Subpart ZZZZ may be used to satisfy these periodic testing requirements if they meet the requirements of this condition and are completed during the specified monitoring period.

**Recordkeeping:** The permittee shall maintain records in accordance with Section B109, B110, and B111.

**Reporting:** The permittee shall report in accordance with Section B109, B110, and B111.

B. Catalytic Converter Operation (Units ENG-1, ENG-2, ENG-3, and ENG-4)

**Requirement:**

The units shall be equipped and operated with a non-selective catalytic converter to control NO<sub>x</sub>, CO, and VOC emissions. These units shall also be equipped with an AFR controlling device, or similar device that performs the same function of maintaining an appropriate air-fuel ratio.

The permittee shall maintain the units according to manufacturer's or supplier's recommended maintenance, including replacement of oxygen sensor as necessary for oxygen-based controllers.

**Monitoring:** The units shall be operated with the catalytic converter, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine(s); or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation.

**Recordkeeping:** The permittee shall maintain records in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

C. 40 CFR 60, Subpart JJJJ (Units ENG-1, ENG-2, ENG-3, and ENG-4)

**Requirement:** The units are subject to 40 CFR 60, Subparts A and JJJJ and shall comply with the notification requirements in Subpart A and the specific requirements of Subpart JJJJ.

**Monitoring:** The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart JJJJ, including but not limited to 60.4243.

**Recordkeeping:** The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart JJJJ, including but not limited to 60.4245.

**Reporting:** The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart JJJJ, including but not limited to 60.4245.

D. 40 CFR 63, Subpart ZZZZ (Units ENG-1, ENG-2, ENG-3, and ENG-4)

**Requirement:** The units are subject to 40 CFR 63, Subpart ZZZZ and the permittee shall comply with all applicable requirements of Subpart A and Subpart ZZZZ.

**Monitoring:** The permittee shall comply with all applicable monitoring requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.

**Recordkeeping:** The permittee shall comply with all applicable recordkeeping requirements of 40 CFR 63, Subpart A and Subpart ZZZZ, including but not limited to 63.6655 and 63.10.

**Reporting:** The permittee shall comply with all applicable reporting requirements of 40 CFR 63, Subpart A and ZZZZ, including but not limited to 63.6645, 63.6650, 63.9, and 63.10.

## A202 Glycol Dehydrators

A. Extended Gas Analysis and Promax<sup>®</sup> or GRI-GLYCalc Calculation (Units DEHY-1 and DEHY-2)

**Requirement:** Compliance with the allowable VOC emission limits in Table 106.A shall be demonstrated by:

(1) The dehydrators shall be equipped with BTEX condensers; and

(2) The permittee shall conduct an annual extended gas analysis on the dehydrator inlet gas.

**Monitoring:** The permittee shall conduct an annual GRI-GlyCalc analysis using the most recent extended gas analysis and verify the input data. The permittee may use a method of calculating dehydrator emissions, such as Promax®, other than the most current version of GRI-GlyCalc if approved by the Department. Changes in the calculated emissions due solely to a change in the calculation methodology shall not be deemed an exceedance of an emission limit.

**Recordkeeping:** The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYcalc or other approved model. The permittee shall keep a record of the results, noting the emission rates for the dehydrator obtained from estimates using GRI-GLYcalc or other approved simulator.

**Reporting:** The permittee shall report in accordance with Section B110.

B. Glycol pump circulation rate (Unit DEHY-1 and DEHY-2)

**Requirement:** Compliance with the allowable VOC emission limit in Table 106.A shall be demonstrated by monitoring the glycol pump circulation rate for DEHY-1 and DEHY-2 and shall not exceed 3060 gallons per hour (51 gallons per minute).

**Monitoring:** The permittee shall monitor the circulation rate quarterly based on a calendar quarter (January 1<sup>st</sup> through March 31<sup>st</sup>, April 1 through June 30<sup>th</sup>, July 1<sup>st</sup> through September 30<sup>th</sup>, and October 1<sup>st</sup> through December 31<sup>st</sup>). Monitoring shall include a calibration visual or audible inspection of pump rate setting.

**Recordkeeping:** The permittee shall maintain records that include a description of the monitoring and are in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

C. Control Device Inspection (Unit DEHY-1 controlled by FL-2)

**Requirement:** To demonstrate compliance with the allowable VOC emission limits in Table 106.A:

(1) regenerator emissions shall be routed at all times to the condenser (BTEX-1) and then to be combusted at the flare (FL-2).

(2) the flash tank emissions shall be routed at all times to a process point that allows the off-gas to be recycled and recompressed, and not vented to the atmosphere. Alternatively, DEHY-1 flash gas shall be routed to flare FL-2 during SSMs.

(3) the condenser emissions (BTEX-1) shall be routed at all times to a flare FL-2. Alternatively, during SSMs the overhead condenser stream shall be vented to atmosphere.

(4) the condenser, flash tank, and flares shall be operational at all times the facility is in operation. The condenser, flash tank, and flare shall be installed, operated, and maintained according to manufacturer's specifications.

**Monitoring:** The permittee shall inspect the glycol dehydrator and the control equipment semi-annually to ensure it is operating as initially designed or in accordance with the manufacturer's recommended procedures. The permittee shall also inspect that the reboiler is operating as initially designed.

**Recordkeeping:** The permittee shall record the inspection and the results of all equipment and

control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the manufacturer's maintenance recommendations.

**Reporting:** The permittee shall report in accordance with Section B110.

D. Control Device Inspection (Unit DEHY-2 controlled by TO-2 and FL-3)

**Requirement:** To demonstrate compliance with the allowable VOC emission limits in Table 106.A:

(1) regenerator still vent emissions shall be routed at all times to the condenser (BTEX-2), then to be combusted at the thermal oxidizer (TO-2).

(3) the flash tank emissions shall be routed at all times to a process point that allows the off-gas to be recycled and recompressed, and not vented to the atmosphere. Alternatively, DEHY-2 flash gas shall be routed to flare FL-3 during SSMs.

(3) the condenser, flash tank, thermal oxidizer, and flare shall be operational at all times the facility is in operation. The condenser, flash tank, and flare shall be installed, operated, and maintained according to manufacturer's specifications.

**Monitoring:** The permittee shall inspect the glycol dehydrator and the control equipment semi-annually to ensure it is operating as initially designed or in accordance with the manufacturer's recommended procedures. The permittee shall also inspect that the reboiler is operating as initially designed or in accordance with the manufacturer's recommended procedures.

**Recordkeeping:** The permittee shall record the inspection and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the manufacturer's maintenance recommendations.

**Reporting:** The permittee shall report in accordance with Section B110.

E. 40 CFR 63, Subpart HH (Unit DEHY-1 and DEHY-2)

**Requirement:** The units are subject to 40 CFR 63, Subpart HH and the permittee shall comply with all applicable requirements, including the general standards of 40 CFR 63.764.

**Monitoring:** The permittee shall comply with the monitoring requirements of 40 CFR 63.773.

**Recordkeeping:** The permittee shall comply with the recordkeeping requirements of 40 CFR 63.774.

**Reporting:** The permittee shall comply with the applicable reporting requirements of 40 CFR 63.775 and in Section B110.

**A203 Tanks**

A. Tank Throughput (Units TK 701, TK-702A, TK-702B, TK-702C, TK-702D, TK-702E, and TK-702F)

**Requirement:** Compliance with the allowable emission limits in Table 106.A shall be

demonstrated by:
<ul style="list-style-type: none"> <li>(1) limiting the monthly rolling 12-month total condensate throughput to units TK-702A, TK-702B, TK-702C, TK-702D, TK-702E, and TK-702F to 91,980,000 gallons per year (2,190,000 barrels/year)</li> <li>(2) limiting the monthly rolling 12-month total produced water throughput to Unit TK-701 to 2,076,371 gallons per year (49,437 barrels/year).</li> </ul>
<b>Monitoring:</b> The permittee shall monitor the monthly total throughput once per month.
<p><b>Recordkeeping:</b> The permittee shall record the monthly total throughput of condensate and produced water liquids. Each month, during the first 12 months of monitoring, the permittee shall record the cumulative total liquid throughput and after the first 12 months of monitoring, the permittee shall calculate and record the monthly rolling 12-month total liquid throughput.</p> <p>Tank breathing and working emissions were calculated using the USEPA Tanks program latest Version (4.0.9.d or more current). Emission rates computed using the same parameters, but with a different Department approved algorithm that exceed these values will not be deemed non-compliance with this permit.</p> <p>Records shall also be maintained in accordance with Section B109.</p>
<b>Reporting:</b> The permittee shall report in accordance with Section B110.

B. Tank Vapor Combustion Unit (VCU-1) Control Device Inspection (Units TK-701, TK-702A, TK-702B, TK-702C, TK-702D, TK-702E, and TK-702F)

<p><b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A shall be demonstrated by operating the vapor combustion units at all times as a closed loop system that captures and routes VOCs from tanks TK-701, TK-702A, TK-702B, TK-702C, TK-702D, TK-702E, and TK-702F back to the process stream and does not vent to the atmosphere.</p>
<p><b>Monitoring:</b> At least once per month, the permittee shall inspect the vapor combustion unit for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. In the event that a leak or defect is detected, the permittee shall repair the leak or defect as soon as practicable and in a manner that minimizes VOC and HAPs emissions to the atmosphere.</p>
<p><b>Recordkeeping:</b> The permittee shall record the results of the vapor combustion unit inspections chronologically, noting any maintenance or repairs that are required.</p>
<b>Reporting:</b> The permittee shall report in accordance with Section B110.

C. Truck Loading - Condensate Loadout (Units TL-1)

<p><b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A shall be demonstrated by limiting the total annual condensate loadout volume to 1,764,000 gallons per year (42,000 barrels/year).</p>
<p><b>Monitoring:</b> The permittee shall monitor the condensate truck loadout volume on a monthly basis.</p>



**Recordkeeping:** The permittee shall record the monthly condensate truck loadout volume. Each month during the first 12 months of monitoring the permittee shall record the cumulative condensate loadout volume and after the first 12 months of monitoring, the permittee shall calculate and record a monthly rolling 12-month total loadout volume.

Records shall also be maintained in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

#### **A204 Heaters/Boilers**

- A. Operational Inspection (HT-101, HT-102, HT-103, HT-801, HT-802, HT-803, DR-1, DR-2, AR-1, and AR-2)

##### **Requirement:**

- (1) Compliance with the allowable emission limits in Table 106.A shall be demonstrated by performing annual inspections to ensure proper operation of the Units.
- (2) At a minimum, the operational inspections shall meet those recommended by the manufacturer or shall meet the facility specific procedure submitted to the Department.
- (3) If the permittee is using a facility specific procedure it shall submit an electronic version of the procedure to the Department's Permit Section Manager within 90 days of implementing the procedure. If the plan cannot be submitted within 90 days, the permittee shall obtain written approval to extend the deadline from the Department's Permit Section, either by regular or electronic mail. The permittee shall provide additional information or make changes to the plan as requested by the Department.
- (4) The permittee shall make changes or improvements to the inspection procedure based on experience with the unit and/or new information provided by the manufacturer. This updated procedure shall be made available to the Department upon request.

##### **Monitoring:**

- (1) Inspections shall be completed at least once per year or at the frequency recommended by the manufacturer.
- (2) At a minimum, inspections shall include the following:
  - (a) checking indicators to verify that the optimal amount of excess combustion air is introduced into the boiler combustion process such as a blue colored, steady flame;
  - (b) inspections of the unit's components and housing for cracks or worn parts.

##### **Recordkeeping:**

- (1) The permittee shall maintain records of operational inspections, including the indicators used to verify optimal excess combustion air, a description of the indicators, the unit component and housing inspections, and any adjustments needed to ensure optimal operation of the unit.
- (2) The permittee shall also keep records of the manufacturer's recommended or the permittee's facility specific operational inspection procedure and shall keep records of the percent of excess combustion air required for optimal performance.
- (3) The permittee shall maintain records in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

**A205 Turbines – NOT REQUIRED**

**A206 Flares and Thermal Oxidizer**

- A. Visible Emissions for Flares and Thermal Oxidizer Flames (20.2.61 NMAC) (Units FL-1, TO-1, and TO-2)

**Requirement:** Compliance with the allowable emission limits in Section A106 shall be demonstrated by the flare and thermal oxidizer being equipped with a system to ensure that it is operated with a flame present at all times and operated with no visible emissions.

The flare and thermal oxidizer are subject to the 20% opacity standards in 20.2.61 NMAC and complying with the no visible emissions requirements demonstrates compliance with 20.2.61 NMAC opacity limit.

**Monitoring:**

**(1) Thermal Oxidizer and Flare Pilot Flame:**

The permittee shall continuously monitor the presence of a pilot flame using a thermocouple or any equivalent device approved by the Department and shall be equipped with a continuous recorder and alarm or equivalent, to detect the presence of a flame.

**(2) Visible Emissions:**

Annually, the permittee shall conduct a visible emissions observation in accordance with the requirements at 40 CFR 60, Appendix A, Reference Method 22 to certify compliance with the no visible emission requirement on FL-1. The observation period is at least 2 consecutive hours where visible emissions are not to exceed a total of 5 minutes during any 2 consecutive hours.

At least once per year during a blow down event, the permittee shall conduct a visible emissions observation in accordance with the requirements at 40 CFR 60, Appendix A, Reference Method 22 to certify compliance with the no visible emission requirements. Each Method 22 test shall occur for the duration of the blow down event or for 30 minutes, whichever is less. Visible emissions shall not occur for more than 5 minutes during any consecutive 30-minute period. For blowdown events that occur for less than 30 minutes, visible emissions shall not occur for more the 15% during the duration of the blow down event.

If the flare is located at an unmanned site, used only for emergencies, and where there are no scheduled blowdown-maintenance events to observe flare combustion, the permittee shall at a minimum conduct the visible emissions observation in accordance with the requirements of EPA Method 22 on the pilot flame.

**Recordkeeping:**

**(1) Thermal Oxidizer and Flare Pilot Flame:**

The permittee shall record all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare or thermal oxidizer into normal operating conditions, and maintenance activities.

**(2) Visible Emissions:**

For any visible emissions observations conducted in accordance with EPA Method 22, the permittee shall record the information on the form referenced in EPA Method 22, Section 11.2.

For any visible emissions observations conducted in accordance with EPA Method 22, record the information on the form referenced in EPA Method 22, Section 11.2. If the visible emissions observation was conducted only on the pilot flame, the record shall also include the reasons that the test could not be conducted during a blowdown event.

**Reporting:** The permittee shall report in accordance with Section B110.

B. Gas Flow Monitoring and Gas Analysis for Flares and Thermal Oxidizer Operation (Units FL-1, FL-2, FL-3, TO-1 and TO-2)

**Requirement:** Compliance with the allowable emission limits in Tables 106.A and 107.A shall be demonstrated by completing the monitoring, recordkeeping, and reporting specified below.

**Monitoring:**

(1) Flow Monitoring:

a. Each flare/TO shall be equipped with a gas flow or a mass flow meter, equipped with a chart recorder or data logger (electronic storage), to monitor gas flow/mass flow and record the total standard cubic feet (scf) of gas sent to Flare Units FL-1, FL-2, FL-3, TO-1, and TO-2.

b. The permittee:

(i) May use manufacturer's specifications to determine pilot, purge, and assist gas flow rates.

(ii) May use the manufacturer's specification or modeling estimations using Promax, E&P Tanks, or another approved method, to determine process gas flow rates.

(2) Calibration: The flow meter(s), mass meter(s), totalizer(s), and if used, the inline monitor shall be operated, calibrated, and maintained as specified by the manufacturer or equivalent and as necessary to ensure correct and accurate readings.

(3) Hourly Flow Rate: Gas flow or mass flow rates shall be logged during, or calculated for, each hour and each month that the flare/TO is in operation.

(4) Gas Analysis: The permittee shall measure the H<sub>2</sub>S content, the total sulfur content, the VOC content, and the heating value (Btu/scf) of the gas sent to the flare/TO for combustion or to the amine unit. H<sub>2</sub>S shall be measured at least quarterly using a stain tube of the appropriate size range or an inline H<sub>2</sub>S monitor; or measured annually with an extended gas analysis. The total sulfur content, VOC content, and heating value

(Btu/scf) of the natural gas sent to the flare/TO shall be measured at least once annually with an extended gas analysis.

**Recordkeeping:** The following records shall be kept:

- (1) Flow Monitoring & (2) Calibration: Records of flowmeter or mass meter, totalizer, and inline monitor certifications, calibrations, breakdowns, reasons for the breakdown, and corrective actions. If manufacturer's specifications are used to determine pilot and purge fuel gas flow, the manufacturer's specification documentation must be maintained.
- (2) Hourly Flow Rate: Records of the calculated average hourly flowmeter/mass meter and flow/mass totalizer measurements of process and assist gas sent to the flare/TO or the amine unit in scf/hr.
- (3) Gas Analysis: Sample documentation as received from the laboratory including H<sub>2</sub>S content, the total sulfur content, the VOC content, and the heating value (Btu/scf) and analysis method utilized.

The permittee shall maintain all records in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

#### C. Control Efficiency for Thermal Oxidizer (Units TO-1 and TO-2)

**Requirement:** Compliance with the allowable emission limits in Table 106.A shall be demonstrated by maintaining a flame anytime gas is routed to the oxidizer and maintaining a burning temperature that achieves a destruction efficiency at or above 98% for VOCs and H<sub>2</sub>S, and monitoring unit downtime or malfunction. Temperature is used as the indicator for the estimated destruction efficiency.

**Monitoring:** The permittee shall determine a combustion temperature that achieves the required destruction efficiency from periodic emissions testing performed in accordance with A206.E and monitor the combustion temperature of the Thermal Oxidizer continuously and record the temperature once per 24-hour period. Compliant combustion temperature is defined as within +/- 5% of the temperature during the emissions test.

**Recordkeeping:** The permittee shall maintain records including the date and time of each temperature reading, detail any deficiencies in operation identified, and record any corrective actions taken to restore the control device to operation.

Records shall also be maintained in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

#### D. Emissions Calculation for Thermal Oxidizer (Unit TO-1 and TO-2)

**Requirement:** Compliance with the thermal oxidizer allowable emission limits in Table 106.A shall be demonstrated by operating the thermal oxidizer in accordance with the requirements, monitoring, and recordkeeping of Condition A206.B and completing emissions calculations as specified in this condition.

**Monitoring:** No monitoring is required. Compliance is demonstrated through records.

**Recordkeeping:** The permittee shall maintain records of all calculations and parameters used to determine emission rates in spreadsheet format and in accordance with Condition B109.

**(1) Hourly Emissions Calculations:** The permittee shall calculate the pounds per hour (pph) NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, and H<sub>2</sub>S emission rates using these parameters:

- (a) the calculated average hourly flow rate of all gas combusted by the flare including pilot, purge, and assist gas, if applicable, (Condition A206.D(1));
- (b) gas analysis including H<sub>2</sub>S content, total sulfur content, VOC content, and heating value (BTU/scf) of the gas (Condition A206.D(2));
- (c) the TNRCC RG-109 (high Btu; other) emission factors for NO<sub>x</sub> and AP-42 Tables 13.5-1 and 13.5-2 emission factors for NO<sub>x</sub> and CO emission rates; and
- (d) VOC and H<sub>2</sub>S emission rates calculated using a destruction efficiency of 98% based on the manufacturers guarantee.

**(2) Annual Emissions Calculations:** The permittee shall calculate the total ton per year (tpy) emission rates as a monthly rolling 12-month total, using the totaled pph emission rates for each hour of the month:

- (a) During the first 12 months of this condition taking effect, the permittee shall record the total tons of NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, and H<sub>2</sub>S emissions.
- (b) After the first 12 months of this condition taking affect, the permittee shall record the monthly rolling 12-month total tpy NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, and H<sub>2</sub>S emissions.

**Reporting:** The permittee shall report in accordance with Section B110.

#### E. Initial and Periodic Emissions Testing for Thermal Oxidizer (Unit TO-1 and TO-2)

**Requirement:** Compliance with the allowable emission limits in Table 106.A shall be demonstrated by emission tests for NO<sub>x</sub> and CO and calculating the destruction efficiency for VOCs and H<sub>2</sub>S of the thermal oxidizer during the monitoring period.

#### **Monitoring:**

**NO<sub>x</sub> and CO:** The permittee shall complete an initial compliance test for NO<sub>x</sub> and CO using a portable analyzer or EPA Reference Method Test subject to the requirements and limitations of Section B111. The initial compliance test shall take place within 180 days of permit issuance.

**VOC and H<sub>2</sub>S Destruction Efficiency:** The permittee shall conduct periodic emissions tests using EPA Reference Method 25a or Method 18 subject to the requirements and limitations of Section B108, General Monitoring Requirements. Emission testing is required for un-specified VOCs pre-control and post-TO (stack). Periodic emissions testing shall be carried out as described below.

Test results for pre-control and post-control VOCs shall be used to calculate the destruction

efficiency of the thermal oxidizer at the operating combustion temperature. Compliant destruction efficiency is defined as a percentage equal to or greater than 98%. Compliance with the destruction efficiency of 98% for VOCs shall also demonstrate compliance for H<sub>2</sub>S.

- (1) The Periodic emissions tests shall be conducted as follows:
- (a) The first test shall take place within 180 days of permit issuance and thereafter;
  - (b) Testing frequency shall be once per year.
  - (c) The monitoring period is defined as a calendar year.
- (2) All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period.
- (3) The permittee shall follow the General Testing Procedures of Section B111.

**Recordkeeping:** The permittee shall maintain records in accordance with Section B109, B110, and B111.

**Reporting:** The permittee shall report in accordance with Section B109, B110, and B111.

F. Emissions Calculation for Flares (Units FL-1, FL-2, and FL-3)

**Requirement:** Compliance with the flare allowable emission limits in Table 106.A shall be demonstrated by operating the flare in accordance with the requirements, monitoring, and recordkeeping of Condition A206.B and completing emissions calculations as specified in this condition.

**Monitoring:** No monitoring is required. Compliance is demonstrated through records.

**Recordkeeping:** The permittee shall maintain records of all calculations and parameters used to determine emission rates in spreadsheet format and in accordance with Condition B109.

- (1) **Hourly Emissions Calculations:** The permittee shall calculate the pounds per hour (pph) NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, and H<sub>2</sub>S emission rates using these parameters:
- (a) the calculated average hourly flow rate/mass rate of all gas combusted by the flare including pilot, purge, and assist gas, if applicable, (Condition A206.D(1));
  - (b) gas analysis including H<sub>2</sub>S content, total sulfur content, VOC content, and heating value (BTU/scf) of the gas (Condition A206.D(4));
  - (c) the current published emission factors for NO<sub>x</sub> and CO emission rates; and
  - (d) VOC and H<sub>2</sub>S emission rates calculated using a destruction efficiency of no more than 98%.
- (2) **Annual Emissions Calculations:** The permittee shall calculate the total ton per year (tpy) emission rates as a monthly rolling 12-month total, using the totaled pph emission rates for each hour of the month:
- (a) During the first 12 months of this condition taking effect, the permittee shall record the total tons of NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, and H<sub>2</sub>S emissions.

(b) After the first 12 months of this condition taking affect, the permittee shall record the monthly rolling 12-month total tpy NOx, CO, VOC, SO<sub>2</sub>, and H<sub>2</sub>S emissions.

**Reporting:** The permittee shall report in accordance with Section B110.

G. Flare Testing Requirements 40 CFR 60, Subpart HH and 20.2.61 NMAC (Units FL-2, and FL-3)

**Requirement:**

For flares used as a control device to meet the requirements of a subpart in 40 CFR 60 compliance with the visible emissions, flare gas heating value and exit velocity requirements at 40 CFR §60.18 shall be demonstrated by conducting a performance test.

Compliance with the testing requirements in this condition demonstrates compliance with the opacity limits required in 20.2.61 NMAC.

**Monitoring:**

The permittee shall conduct a performance test, if applicable, on the flares in accordance with the requirements at 40 CFR 60, Subpart A, §§60.8 (performance tests) and 60.18 (general control device requirements).

**Recordkeeping:**

The permittee shall maintain records of the flares performance test results, if applicable, in accordance with the requirements of Section B109.

**Reporting:**

The permittee shall report [in accordance with the applicable Subpart in 40 CFR 60 (if any) and] in accordance with the requirements of Sections B110 and B111.

H. Flare Operating Requirements 40 CFR 60, Subpart HH and 20.2.61 NMAC (Units FL-2, and FL-3)

**Requirement:**

Flares(s) shall comply with the operational requirements (including but not limited to flame presence and no visible emissions) specified by the general control device requirements at 40 CFR §60.18. Compliance with the operating requirements of 40 CFR 60 demonstrates compliance with the opacity limits required by 20.2.61 NMAC.

**Monitoring:**

The permittee shall monitor flare operation in accordance with the applicable requirements at 40 CFR §60.18.

**Recordkeeping:**

The permittee shall maintain records of flare operation in accordance with the applicable requirements of 40 CFR §60.18 and with the requirements of Section B109.

**Reporting:**

The permittee shall report in accordance with the requirements of Section B110.

**A207 Sulfur Recovery Unit- NOT REQUIRED**

**A208 Amine Unit**

A. Extended Gas Analysis (Units AM-1 and AM-2)

<p><b>Requirement:</b></p> <p>A. To demonstrate compliance with the allowable H2S emission limits in Table 106.A, the permittee shall conduct the following analyses:</p> <ol style="list-style-type: none"> <li>1. An annual extended gas analysis on a representative sample upstream of the sweetening unit.</li> <li>2. Verification sampling and analysis will be conducted biannually (every two years) on regenerator still vent emissions.</li> </ol> <p>B. Every two years, the extended gas analysis will include sampling and analysis for H2S. The value presented will be a numerical value, or if less than the laboratory method detectable limit, the minimum detection limit will be reported.</p>
<p><b>Monitoring:</b> The permittee shall conduct an annual extended gas analysis of the inlet gas.</p> <ol style="list-style-type: none"> <li>1. Confirmation testing on amine emission points (e.g. flash tank, regenerator, still vent) will be performed biannually (every two years).</li> </ol>
<p><b>Recordkeeping:</b> Records shall be kept of the following:</p> <ol style="list-style-type: none"> <li>1. Gas analysis H2S, CO2, VOC content of the inlet gas.</li> <li>2. An annual calculation of the average hourly and total annual emissions for [H2S, VOC] based on the most recent annual extended gas analysis will be performed using, but not limited to AmineCalc, HYSYS, or ProMax.</li> <li>3. All parameters that were used as inputs to the model or calculations [i.e.; AmineCalc, HYSYS, or ProMax].</li> <li>4. Verification sampling and analysis on [flash tank] and/or [regenerator still vent] emissions.</li> </ol>
<p><b>Reporting:</b> The permittee shall report in accordance with Section B110.</p>

B. Amine pump circulation rate (AM-1 and AM-2)

<p><b>Requirement:</b> To demonstrate compliance with the allowable VOC emission limits in Table 106.A, the amine pump circulation rate for the unit shall not exceed 17,400 gallons per hour (290 gallons per minute).</p>
<p><b>Monitoring:</b> Monitoring: The permittee shall monitor the circulation rate (gph) monthly.</p>
<p><b>Recordkeeping:</b> Recordkeeping: The permittee shall keep records in accordance with Section B109 and of the following:</p> <ol style="list-style-type: none"> <li>1. Pump flow rate in gph.</li> <li>2. Basis for determination of flowrate.</li> </ol>
<p><b>Reporting:</b> The permittee shall report in accordance with Section B110.</p>

C. Sweetening Unit (AM-1 and AM-2) with Control Devices TO-1/TO-2 (Thermal Oxidizers) and FL-2/FL-3 (Flares), respectively.



**Requirement:** To demonstrate compliance with the allowable emission limits in Table 106.A, the amine units AM-1 and AM-2 shall have the following emissions routing and control devices.

- 1) For amine sweetening unit AM-1:
  - a) Flash emissions shall have a closed system and not vent to atmosphere at any time. Vapors shall be routed to process at all times except for SSMs. During SSM events, the vapors shall be routed to flare unit FL-2.
  - b) Waste gas shall be routed to thermal oxidizer unit TO-1 at all times except for SSMs. During SSM events, vapors shall be vented.
- 2) For amine sweetening unit AM-2:
  - c) Flash emissions shall have a closed system and not vent to atmosphere at any time. Vapors shall be routed to process at all times except for SSMs. During SSM events, the vapors shall be routed to flare unit FL-3.
  - d) Waste gas shall be routed to thermal oxidizer unit TO-2 at all times except for SSMs. During SSM events, vapors shall be vented.

The flash emissions closed vent system shall be designed and operated so that there are no leaks to the atmosphere. At no time shall any flash emissions be emitted directly to the atmosphere.

**Monitoring:** The permittee shall inspect the amine treatment unit and the control equipment semi-annually to ensure it is operating as initially designed or in accordance with the manufacturer's recommended procedures.

The permittee shall inspect the pipe routed from the sweetening unit's flash and waste stream emissions to process and control devices, as described above, semi-annually to ensure that there is no degradation of welds or other deficiencies.

**Recordkeeping:** The permittee shall record the name of the person conducting the inspection and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the amine treatment unit into compliance.

The permittee shall maintain a copy of the manufacturer's maintenance recommendations.

**Reporting:** The permittee shall report in accordance with Section B110.

## A209 Fugitives

### A. 40 CFR 60, Subpart OOOOa – Fugitives (Unit FUG)

**Requirement:** Equipment in VOC or in wet gas service (as defined in 40 CFR §60.5430a) is subject to the GHG and VOC equipment leak standards at 40 CFR §60.5400a of 40 CFR 60, Subpart OOOOa. The permittee shall comply with all applicable requirements in Subparts A and OOOOa.

**Monitoring:** The permittee shall implement a leak detection and repair program and shall

comply with the standards as specified at 40 CFR §60.5400a except as provided in §60.5401a.
<b>Recordkeeping:</b> The permittee shall comply with the recordkeeping requirements specified at 40 CFR §§60.5400a(e) and 60.486a except as provided in §§60.5401a and 60.5421a.
<b>Reporting:</b> The permittee shall comply with the reporting requirements specified at 40 CFR §§60.5400a(e) and 60.487a except as provided in §§60.5401a and 60.5422a.

B. 40 CFR 60, Subpart OOOOa – Compressors (Units ENG-1-ENG-4)

<b>Requirement:</b> The reciprocating compressors at this facility are subject to 40 CFR 60, Subparts A and OOOOa and the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart OOOOa, including standards in §60.5385a.
<b>Monitoring:</b> The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5410a, §60.5411a, §60.5415a, and §60.5416a.
<b>Recordkeeping:</b> The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a.
<b>Reporting:</b> The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a, and in Section B110.

C. 40 CFR 60, Subpart OOOOa – Amine Units (Units AM-1, AM-2)

<b>Requirement:</b> The unit is subject to 40 CFR 60, Subparts A and OOOOa if the source is constructed, modified, or reconstructed after the applicability date in 40 CFR 60.5365a. The permittee shall comply with the applicable requirements in Subpart A and the specific requirements of Subpart OOOOa. Per 60.5365a(g)(3) these units are required to comply with 60.5423a(c) but are not required to comply with 60.5405a through 60.5407a, 60.5410a(g), or 60.5415a(g).
<b>Monitoring:</b> The permittee shall comply with all applicable monitoring and testing requirements in 40 CFR 60, Subpart A and Subpart OOOOa.
<b>Recordkeeping:</b> The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to 60.5423a(c).
<b>Reporting:</b> The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to 60.5423a(c), and in Section B110.

**CONSTRUCTION INDUSTRY – AGGREGATE-**

**A300 Construction Industry – Aggregate- NOT REQUIRED**

**CONSTRUCTION INDUSTRY – ASPHALT**

**A400 Construction Industry – Asphalt- NOT REQUIRED**

**CONSTRUCTION INDUSTRY - CONCRETE**

**A500 Construction Industry – Concrete- NOT REQUIRED**

**POWER GENERATION INDUSTRY**

**A600 Power Generation Industry- NOT REQUIRED**

**SOLID WASTE DISPOSAL (LANDFILLS) INDUSTRY**

**A700 Solid Waste Disposal (Landfills) Industry– NOT REQUIRED**

**A800 Miscellaneous Operations Introduction – NOT REQUIRED**

**MISCELLANEOUS DOCUMENTS**

**A801 40 CFR 64, Compliance Assurance Monitoring (CAM) Plan**

- A. 40 CFR 64, Compliance Assurance Monitoring (CAM) Plan Requirements (Units DEHY-1, DEHY-2, and TK-701): The permittee shall meet the requirements of the CAM Plan when applying for a new Title V Permit, or any subsequently issued Title V Permits.

**PART B GENERAL CONDITIONS (Attached)**

**PART C MISCELLANEOUS: Supporting On-Line Documents; Definitions; Acronyms (Attached)**